

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

<b>HAIR CLUB FOR MEN, LTD., INC.,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	<b>Case No. 1:16-cv-10268</b>
	)	
<b>SEAN LEE and 360 HAIR CLUB,</b>	)	
<b>CORPORATION</b>	)	
	)	
<b>Defendants.</b>	)	

**STIPULATED CONSENT JUDGMENT AND PERMANENT INJUNCTION  
AGAINST DEFENDANTS SEAN LEE AND 360 HAIR CLUB CORPORATION**

Plaintiff Hair Club For Men, Ltd., Inc. (“Hair Club”) and Defendants Sean Lee (“Lee”) and 360 Hair Club Corporation (“360 Hair Club,” and collectively with Lee, “Defendants”) hereby stipulate as follows:

1. **The Action.**

Hair Club initiated this action against Defendants alleging federal and common law trademark infringement, false designation of origin and acts of unfair competition. Defendants are operating a business under the name 360 HAIR CLUB (the “Infringing Mark”) which has caused irreparable harm to Hair Club for which it has no adequate remedy at law.

Hair Club owns numerous U.S. trademark registrations incorporating the mark HAIR CLUB, including:

<b><u>Trademark</u></b>	<b><u>Reg. No.</u></b>	<b><u>Services</u></b>	<b><u>Reg. Date.</u></b>
HAIR CLUB FOR MEN	1123852	Beauty services-namely, hair weaving and replacement services	August 7, 1979
HAIR CLUB	1317389	Beauty services, namely hair weaving and replacement services	January 29, 1985
I'M NOT ONLY THE HAIR CLUB PRESIDENT, I'M ALSO A CLIENT	1573996	Beauty services, namely hair weaving and replacement services	December 26, 1989

<b><u>Trademark</u></b>	<b><u>Reg. No.</u></b>	<b><u>Services</u></b>	<b><u>Reg. Date.</u></b>
HAIR CLUB FOR KIDS	1830003	Beauty services, namely hair weaving and replacement services	April 5, 1994
HAIR CLUB FOR WOMEN	1903844	Beauty services, namely hair weaving and replacement services	July 4, 1995
HAIR CLUB FOR MEN AND WOMEN (and design)	3057215	Beauty services; namely, hair replacement, hair weaving and hair care services	November 7, 2006
HAIR CLUB (and design)	4636488	Beauty services, hair replacement, hair weaving and hair care services, namely, hair salon services, hair cutting services.	November 11, 2014
HAIR CLUB (and design)	4757340	Beauty services, hair replacement, hair weaving and hair care services, namely, hair salon services, hair cutting services	June 16, 2015

Collectively, the above trademarks are hereinafter referred to as the “HAIR CLUB Marks.” The HAIR CLUB Marks are registered on the Principal Register of the United States Patent and Trademark Office, and these registrations have always been, and continue to be, in full force and effect. With the exception of Registration Nos. 4,636,488 and 4,757,340, the HAIR CLUB Marks’ registrations are incontestable under Section 15 of the Lanham Act, 15 U.S.C. § 1065, providing conclusive evidence of the validity of the registrations, of Hair Club’s ownership of those marks and of its right to use those marks in commerce for the services listed above, as provided in 15 U.S.C. § 1057(b) and § 1115(a).

2. **The Settlement.**

Hair Club and Defendants (collectively the “Parties”) stipulate that a settlement in the above matter has been reached between the Parties and that the terms of that settlement are embodied in a separately executed Settlement Agreement (“Settlement Agreement”).

The Parties stipulate that, as a part of the Settlement Agreement, Hair Club shall separately file a stipulation of dismissal signed by the Parties upon the Court’s entry of an order accepting this Stipulated Consent Judgment And Permanent Injunction.

3. **Defendants’ Obligations.**

Defendants have agreed, consented and stipulated to this Consent Judgment and Permanent Injunction and to each and every provision, order and decree hereof, including as follows:

- a. Defendants agree and stipulate that the HAIR CLUB Marks are valid and enforceable trademarks for the products and services listed in the registrations for the HAIR CLUB Marks, and the registrations for the HAIR CLUB Marks are valid, enforceable trademark registrations. Defendants further agree that they will not directly or indirectly challenge (nor cause to be challenged, assist, aid or encourage others to challenge) the validity and enforceability of the HAIR CLUB Marks in any court or other tribunal, including, but not limited to, the United States Patent and Trademark Office.
- b. As of June 1, 2017, Defendants are hereby permanently enjoined from using, or directing another to use, a business name, trademark, trade name, domain name or other name that is similar to the HAIR CLUB Marks, including, but not limited to, the Infringing Mark.
- c. As of June 1, 2017, Defendants shall have cancelled, and shall cause all entities they control or have a right to control to cancel, all federal, state, municipal and other registrations incorporating the Infringing Mark, and any and all marks similar to the HAIR CLUB Marks, including, but not limited to, any and all trademarks, corporate names, trade names, fictitious business names and business licenses.
- d. As of June 1, 2017, Defendants shall have destroyed, and shall cause all entities they control or have a right to control to destroy any and all printed or electronic materials on which the Infringing Mark appears including, but not limited to, signs, banners, menus, merchandise, websites, social media sites and any other materials on which the Infringing Mark, or any marks similar to the HAIR CLUB Marks, appear.
- e. As of June 1, 2017, Defendants shall deliver to Hair Club notice that Defendants, and all entities they control or have a right to control, have ceased any and all use of the Infringing Mark and destroyed all materials, whether printed or electronic, bearing the Infringing Mark.
- f. Defendants agree never to file, or cause any entity they control or have a right to control now or in the future, to file any application to register the Infringing Mark, or any other mark similar to the HAIR CLUB Marks, as a trademark, trade name, business name, social media handle, domain name or any other use in any jurisdiction worldwide.

4. The Parties stipulate that Hair Club has the full right and authority to file this Stipulation and Consent Judgment with this Court. Defendants consent to and shall not challenge entry by this Court of the Consent Judgment.

IT IS SO STIPULATED:

DATED: April 4, 2017

360 HAIR CLUB CORPORTION



By: Sang Lee, Esq.  
Attorney for 360 Hair Club Corporation

DATED: April 4, 2017

SEAN LEE



By: Sang Lee, Esq.  
Attorney for Sean Lee

DATED: April 25, 2017

HAIR CLUB FOR MEN, LTD., INC.



By: Michael Geller  
Attorney for Hair Club For Men, Ltd., Inc.

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served using CM/ECF on this 25th day of April, 2017 on all counsel or parties of record on the Service List below.

Sang K Lee  
Law Offices of Sang Lee  
505 E Golf Road Suite H  
Arlington Heights, IL 60005  
(847) 208-8617  
Email: slee000@aol.com

/s/ Michael A. Geller

Michael A. Geller